

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

ROBERT "BOB" BURNS, Chairman
BOYD DUNN
SANDRA D. KENNEDY
JUSTIN OLSON
LEA MARQUEZ-PETERSON

IN THE MATTER OF RESOURCE
PLANNING AND PROCUREMENT IN 2019,
2020 AND 2021

Docket No. E-00000V-19-0034

Notice of Timing of Joint Comments by
SWEEP and Sierra Club

**Notice of Timing of Joint Comments by the Southwest Energy Efficiency Project and
Sierra Club on Arizona Public Service 2020 Integrated Resource Plan**

The Southwest Energy Efficiency Project (SWEEP) and Sierra Club provide notice today that their joint response and analysis on Arizona Public Service Company's (APS) 2020 Integrated Resource Plan (IRP) will be filed with the Arizona Corporation Commission after today's October 15th comment deadline. As stakeholders that are actively engaged in Arizona's electric utility IRP proceedings, we are alerting the Commission that we have engaged outside expertise to conduct an extensive and thorough analysis of APS' IRP, including independent capacity expansion modeling.

In August 2020, the Commission approved a new timeline for its review and approval of the utility 2020 IRPs. In light of the opportunity provided by this timeline extension, as well as the recent unprecedented heatwave and related grid challenges, SWEEP and Sierra Club decided it would be prudent and beneficial to bring additional independent expertise and analysis to bear to support the Commission in its review of APS' IRP. Similar independent analyses commissioned by SWEEP have provided invaluable insight into Salt River Project's (SRP) and Tucson Electric Power's (TEP) resource planning processes.

SWEEP and the Sierra Club have commissioned the services of Strategen Consulting¹ to conduct this independent analysis, which will include:

- A complete Capacity Expansion Model (CEM) that determines the least cost portfolio of resources that should be built to reliably meet electricity demand over the next fifteen years.
- Various portfolios that will evaluate the economic cycling of coal units and determine the level of demand-side resources that can reliably meet customer electricity needs.

¹ Strategen Consulting is an internationally recognized boutique consulting practice focused on energy sector market transformation for a low carbon grid. Their functional expertise includes technical and economic analysis including on issues related to integrated resource planning, energy storage, solar, wind, electric vehicles, demand response and energy efficiency. For more information, see: <https://www.strategen.com/consulting>

While we intended to file this analysis today, it has taken a few weeks for our data requests to be processed. As such, we will be completing and filing our report by mid-November. We are confident that this report will provide value to the current resource planning process, as well as other related Commission processes and forums. We welcome the opportunity to brief Commissioners, Staff, and other stakeholders on our findings.

We look forward to continued engagement with the Commission on these issues.

Sincerely,

Ellen Zuckerman

Co-Director, Utility Program, SWEEP

Sandy Bahr

Chapter Director, Sierra Club, Grand Canyon
Chapter